

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
WHITE PLAINS DIVISION

In re:	Chapter 11
SEARS HOLDING CORPORATION, <i>et al.</i> ,	Case No. 18-23538
Debtors.	Joint Administration Pending

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES AND PAPERS

PLEASE TAKE NOTICE that IRC Marketplace at Six Corners, L.L.C. and IRC Park Center Plaza, L.L.C. (“Landlords”), creditors and parties-in-interest in the above-captioned cases, hereby appear by their counsel, Connolly Gallagher LLP, and such counsel hereby enters its appearance pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned cases be given and served upon the following persons at the following addresses, including email addresses, telephone, and facsimile numbers:

Karen C. Bifferato, Esq.
Kelly M. Conlan, Esq.
N. Christopher Griffiths, Esq.
Connolly Gallagher LLP
1000 West Street, Suite 1400
Wilmington, DE 19801
Telephone: (302) 757-7300
Facsimile: (302) 757-7299
Email: kbifferato@connollygallagher.com
Email: kconlan@connollygallagher.com
Email: cgriffiths@connollygallagher.com

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes,

without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-captioned cases and proceedings related thereto.

This Notice of Appearance and Request for Notices and Papers shall not be deemed or construed to be a waiver of (a) Landlords' rights (i) to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) to trial by jury in any proceeding so triable in these cases or in any case, controversy, or proceeding related to these cases, and (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (b) any other rights, claims, actions, setoffs, or recoupments to which Landlords are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments, Landlords expressly reserve.

Dated: October 16, 2018

CONNOLLY GALLAGHER LLP

/s/ Karen C. Bifferato

Karen C. Bifferato (DE 3279)

Kelly M. Conlan (DE 4786)

N. Christopher Griffiths, Esq. (DE 5180)

CONNOLLY GALLAGHER LLP

The Brandywine Building

1000 N. West Street, Suite 1400

Wilmington, DE 19801

Telephone: (302) 757-7300

Facsimile: (302) 757-7299

Email: kbifferato@connollygallagher.com

Email: kconlan@connollygallagher.com

Email: cgriffiths@connollygallagher.com

Attorneys for Landlords

CERTIFICATE OF SERVICE

I, Karen C. Bifferato, hereby certify that on the 16th day of October, 2018, a true and correct copy of the foregoing *Notice of Appearance and Request for Service of Papers* was sent via ECF Noticing to all parties receiving ECF Notices in this chapter 11 case.

/s/ Karen C. Bifferato

Karen C. Bifferato (DE 3279)